

# **EXHIBIT E**

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

CLAUDIUS ENGLISH, :

a/k/a "Jay Barnes," :

a/k/a "Brent English," :

Defendant. :

- - - - - X

INDICTMENT

18 Cr.

18 CRIM

492

COUNT ONE

(Conspiracy to Engage in Sex Trafficking of Minors)

The Grand Jury charges:

1. In or about 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, and others known and unknown, conspired and agreed with each other to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means persons who had not attained the age of 18 years at the time (collectively, the "Minor Victims"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that the Minor Victims had not attained the age of 18 years, and knowing that the Minor Victims would be caused to engage in commercial sex acts.

(Title 18, United States Code, Sections 1594(c), 1591(a)(1), (b)(1), and (b)(2).)

COUNT TWO  
(Sex Trafficking of Minor Victim-1)

The Grand Jury further charges:

2. Between at least in or about March 2013 and at least in or about April 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, in or affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited a person who had attained the age of 14 years but had not attained the age of 18 years at the time ("Minor Victim-1"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-1 had not attained the age of 18 years, and knowing that Minor Victim-1 would be caused to engage in commercial sex acts, to wit, ENGLISH recruited and enticed Minor Victim-1, a seventeen-year-old girl, to travel from New Jersey to the Bronx, New York, where ENGLISH took photographs of Minor Victim-1, posted such photographs on an internet advertisement website, and harbored and transported Minor Victim-1 for the purpose of engaging in sexual acts with other men in exchange for money, some of which ENGLISH kept for himself.

(Title 18, United States Code,  
Sections 1591(a)(1) and (b)(2), and 2.)

COUNT THREE  
(Sex Trafficking of Minor Victim-2)

The Grand Jury further charges:

3. Between at least in or about March 2013 and at least in or about April 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, in or affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited a person who had attained the age of 14 years but had not attained the age of 18 years at the time ("Minor Victim-2"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-2 had not attained the age of 18 years, and knowing that Minor Victim-1 would be caused to engage in commercial sex acts, to wit, ENGLISH recruited and enticed Minor Victim-2, a seventeen-year-old girl, to travel from New Jersey to the Bronx, New York, where ENGLISH took photographs of Minor Victim-2, posted such photographs on an internet advertisement website, and harbored and transported Minor Victim-2 for the purpose of engaging in sexual acts with other men in exchange for money, some of which ENGLISH kept for himself.

(Title 18, United States Code,  
Sections 1591(a)(1) and (b)(2), and 2.)

COUNT FOUR  
(Sex Trafficking of Minor Victim-3)

The Grand Jury further charges:

4. At least in or about November 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, in or affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited a person who had attained the age of 14 years but had not attained the age of 18 years at the time ("Minor Victim-3"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-3 had not attained the age of 18 years, and knowing that Minor Victim-3 would be caused to engage in commercial sex acts, to wit, ENGLISH recruited and enticed Minor Victim-3, a sixteen-year-old girl, to travel to the Bronx, New York, where ENGLISH took photographs of Minor Victim-3, intending such photographs to be posted on an internet advertisement website, and harbored Minor Victim-3 for the purpose of engaging in sexual acts with other men in exchange for money, some of which ENGLISH kept for himself.

(Title 18, United States Code,  
Sections 1591(a)(1) and (b)(2), and 2.)

COUNT FIVE

(Attempted Sex Trafficking of Minor Victim-4)

The Grand Jury further charges:

5. At least in or about September 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, in or affecting interstate and foreign commerce, attempted to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person who had not attained the age of 14 years at the time ("Minor Victim-4"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-4 had not attained the age of 14 years, and knowing that Minor Victim-4 would be caused to engage in commercial sex acts, to wit, ENGLISH attempted to recruit, entice, transport, and obtain Minor Victim-4, an eleven-year-old girl, to engage in sexual acts with at least one man in exchange for money, some of which ENGLISH would keep for himself.

(Title 18, United States Code,  
Sections 1594(a), 1591(a)(1) and (b)(1), and 2.)

COUNT SIX

(Attempted Sex Trafficking of Minor Victim-5)

The Grand Jury further charges:

6. At least in or about October 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, in or affecting

interstate and foreign commerce, attempted to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person who had not attained the age of 14 years at the time ("Minor Victim-5"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-5 had not attained the age of 14 years, and knowing that Minor Victim-5 would be caused to engage in commercial sex acts, to wit, ENGLISH attempted to recruit, entice, transport, and obtain Minor Victim-5, an eight-year-old girl, to engage in sexual acts with at least one man in exchange for money, some of which ENGLISH would keep for himself.

(Title 18, United States Code,  
Sections 1594(a), 1591(a)(1) and (b)(1), and 2.)

**COUNT SEVEN**

**(Attempted Sex Trafficking of Minor Victim-6)**

The Grand Jury further charges:

7. At least in or about October 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, in or affecting interstate and foreign commerce, attempted to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person who had not attained the age of 14 years at the time ("Minor Victim-6"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of

the fact that Minor Victim-6 had not attained the age of 14 years, and knowing that Minor Victim-6 would be caused to engage in commercial sex acts, to wit, ENGLISH attempted to recruit, entice, transport, and obtain Minor Victim-6, an thirteen-year-old girl, to engage in sexual acts with at least one man in exchange for money, some of which ENGLISH would keep for himself.

(Title 18, United States Code,  
Sections 1594(a), 1591(a)(1) and (b)(1), and 2.)

**COUNT EIGHT**  
**(Sex Trafficking of Minor Victim-7)**

The Grand Jury further charges:

8. At least in or about October and November 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, in or affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited a person who had attained the age of 14 years but had not attained the age of 18 years at the time ("Minor Victim-7"), and attempted to do the same, knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-7 had not attained the age of 18 years, and knowing that Minor Victim-7 would be caused to engage in commercial sex acts, to wit, ENGLISH recruited and enticed Minor Victim-7, a fourteen-year-old girl, to travel to the Bronx, New



York, where ENGLISH attempted to take photographs of her, harbor her, and cause her to engage in sexual acts with at least one man in exchange for money, some of which ENGLISH would keep for himself.

(Title 18, United States Code,  
Sections 1591(a)(1) and (b)(2), and 2.)

**COUNT NINE**  
**(Kidnapping of Minor Victim-7)**

The Grand Jury further charges:

9. On or about November 16, 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," having attained the age of eighteen years, unlawfully, willfully, and knowingly seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away and held for ransom and reward and otherwise Minor Victim-7, who had not attained the age of eighteen years and who was not a familial relation of ENGLISH's or under ENGLISH's legal custody, and in so doing, ENGLISH willfully caused Minor Victim-7 to be transported in interstate commerce, and used a mean, facility, and instrumentality of interstate commerce in committing and in furtherance of the commission of the offense, to wit, ENGLISH used a cellphone to cause Minor Victim-7, a fourteen-year-old girl, to

travel from New Jersey to the Bronx, New York, where he held her against her will inside his apartment.

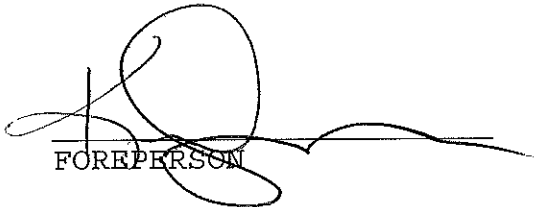
(Title 18, United States Code,  
Section 1201(a)(1) and (g)(1).)

**COUNT TEN**  
**(Firearms Offense Related to Kidnapping)**

The Grand Jury further charges:

10. On or about November 16, 2013, in the Southern District of New York and elsewhere, CLAUDIUS ENGLISH, a/k/a "Jay Barnes," a/k/a "Brent English," the defendant, knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the kidnapping offense charged in Count Nine of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, which was brandished, to wit, ENGLISH brandished a firearm at Minor Victim-7 in the course of kidnapping her, as charged in Count Nine.

(Title 18, United States Code,  
Section 924(c)(1)(A)(i) and (ii).)

  
FOREPERSON

  
GEOFFREY S. BERMAN  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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INDICTMENT

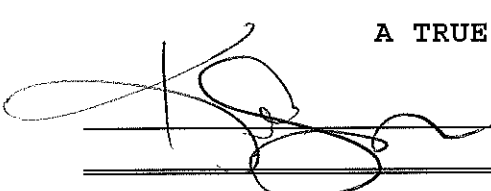
18 Cr.

(Title 18, United States Code, Sections  
1591(a)(1) and (b)(2), and 2.)

GEOFFREY S. BERMAN

United States Attorney.

A TRUE BILL



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Foreperson.

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